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VIA ECFS

Ms. Katie King
Federal Communications Commission
WCB/TAPD
445 12th Street, S.W.
Washington, DC 20554

Re: *In re Connect America Fund*
WC Docket Nos. 10-90, 14-58, CC Docket No. 01-92
A-CAM Model Support for Radcliffe Telephone Company

Dear Ms. King:

On behalf of Radcliffe Telephone Company (“Radcliffe Telephone”), we are writing this letter to request that the Commission reexamine the data used to determine the amount of A-CAM model-based support for which the company is eligible. Radcliffe Telephone has reviewed the Commission’s support determination, and as further detailed below, the company is concerned that the Wireline Competition Bureau (“Bureau”) may have used data attributable to another carrier in determining the amount of the company’s model-based support. Accordingly, Radcliffe Telephone requests that the Commission confirm the accuracy of the data used to ensure that there is no error in the support determination should the company elect to receive model-based support rather than legacy support.

Radcliffe Telephone serves approximately 97% of its study area with fiber-to-the-premises technology in Hardin and Hamilton Counties in central Iowa. However, in determining the company’s model-based support eligibility, the FCC appears to have attributed to Radcliffe Telephone census block codes beginning with FIPS codes 19013, 19021, 19025, 19091, 19103, 19109, 19147, 19151, 19153, 19157, 19161, 19169, 19173, 19175, 19187, and 19193.¹ Those census block codes correspond to Black Hawk, Buena Vista, Calhoun, Humboldt, Johnson, Kossuth, Palo Alto, Pocahontas, Sac, Story, Taylor, Union, Webster, and Woodbury Counties, Iowa. Most of those counties are located in northwestern Iowa, and Radcliffe does not provide service in any of those counties. Based on the census blocks apparently used by the Commission to determine the amount of Radcliffe Telephone’s model-based support, it appears that incorrect census block data may have been used by the FCC to determine the areas in which Radcliffe Telephone is eligible for model-based support.

¹ See <http://transition.fcc.gov/form477/ExcelCensusTractReference2010.xls> (last visited June 6, 2016) for a list of county and census tract codes.

In order for Radcliffe Telephone to be able to make an informed decision on whether to accept the FCC's offer of model-based support, the company needs to be certain that the offer is based on the correct Form 477 data being used in the A-CAM model. Accordingly, the company requests that the Commission review the data used to determine Radcliffe Telephone's model-based support amount, and to verify and validate that the amount of support that will be offered to Radcliffe Telephone pursuant to the A-CAM model is correct. Such verification and validation is needed to ensure that if Radcliffe Telephone accepts the FCC's offer of model-based support, the company will not be at risk of losing support funds should the Commission later determine that Radcliffe Telephone was actually ineligible for model-based support due to errors in the A-CAM model.

Should you have any questions with respect to this matter, please feel free to contact the undersigned at (703) 812-0400.

Respectfully submitted,

/s/ James U. Troup

James U. Troup
Tony S. Lee

Counsel for Radcliffe Telephone Company